REFERENCE 1

CLOSURE PLAN FOR
CPP-731 TRANSFORMER YARD

EPA Facility ID No.: ID 4890008952
Owner's Name: Department of Energy, Idaho Operations Office
Address & Phone No.: 785 DOE Place
Idaho Falls, Idaho 83402
(208) 526-1505
Facility Address: Scoville, Idaho

I. UNIT CONDITIONS

A. General Information

The Idaho Chemical Processing Plant (ICPP) XFR-YDC-3 transformer was originally located in CPP-731, a transformer utilities operations area (Figure 1). As part of the ICPP Utilities Replacement and Expansion Project (UREP), several 2400-volt transformers, including XFR-YDC-3, were taken out of service.

This transformer originally contained approximately 231 gallons of polychlorinated biphenyls (PCBs) at 400 ppm. During an inspection of the transformer in July 1985, leakage around the valves and fittings was noted. The leakage appeared to be on the concrete pad only and not within the soil.

B. Schedule of Partial Closure

The transformer was removed on August 30, 1985, and shipped to a commercial disposal facility (U.S. Pollution). This plan is, therefore, only for the closure of the approximately 10-foot by 10-foot by 3-foot concrete pad and any associated contaminated soil.

C. Maximum Amount of Waste in the Unit

The potential contamination is believed to be confined to the concrete pad. However, this will have to be verified by field analysis. The volume of contaminated material should, therefore, not exceed 10 cubic yards if only the concrete pad is involved.

D. Inventory of Auxiliary Equipment

The only auxiliary equipment associated with the CPP-731 Transformer Yard is the 10-foot by 10-foot by 3-foot concrete pad that will be removed during closure.

E. Schedule of Closure

Figure 2 provides a milestone chart for the closure of the CPP-731 Transformer Yard. Since this transformer yard was never operated as

an interim status facility, a standard closure schedule is not applicable.

F. Estimated Cost of Closure for Unit

This estimate assumes that both the concrete pad and associated soils contain hazardous PCB materials or mixed waste and must be removed, but that no groundwater contamination resulted from the unit.

	$K
Sample collection:	5
Sample analysis:	5
Engineering remedial design:	5
Closure completion:	15-20
Total:	30-35

II. DECONTAMINATING THE UNIT

A. Area of Unit with Potential Soil Contamination

No soil is believed to be contaminated. However, the soil immediately adjacent to the concrete pad will be sampled to ensure that no contamination exists.

EPA-approved field procedures will be used to collect representative samples by qualified and trained personnel. Also, vadose-zone-monitoring may be conducted to determine the extent of releases. WINCO or other laboratory facilities, with appropriate quality control and quality assurance programs, will use EPA-approved laboratory procedures to quantify the presence or absence of hazardous materials. These samples will be analyzed for the following: PCBs and radionuclides. If significant levels of contamination exist in any sample, then additional sampling and analysis will be performed to determine the degree and extent of contamination. This information will be used to estimate the volume of contaminated soil. All contaminated material will be removed and sent to an off-site TSD facility. Contaminated soil will not be disposed of on site. If mixed radioactive waste is identified, it will be removed and sent to a permitted storage facility at the INEL.

B. Equipment Requiring Decontamination

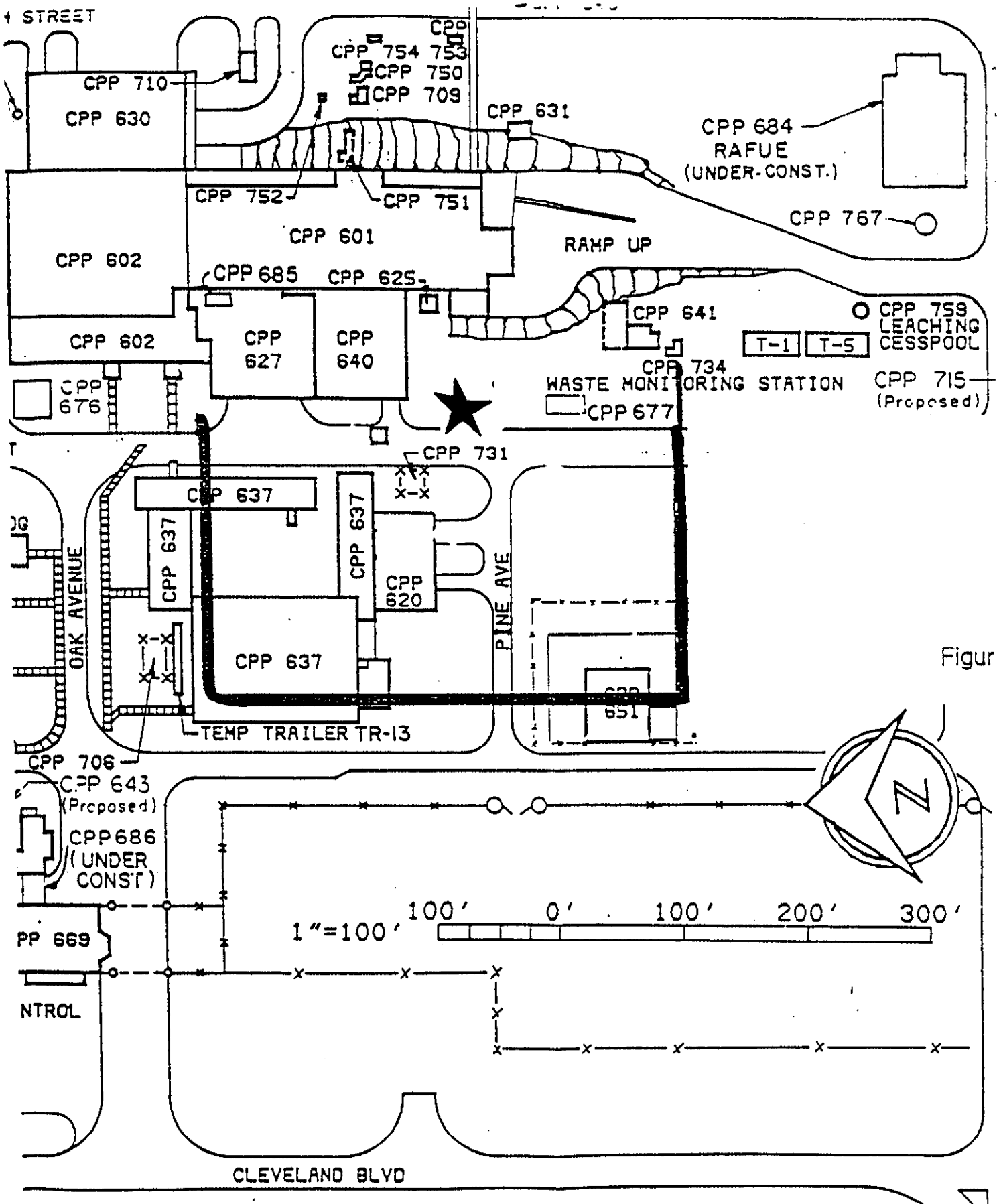
If the transformer yard is found to contain hazardous and/or mixed waste, then removal will be performed. All equipment used to perform this task will require decontamination. All contaminated equipment will be placed on plastic and decontaminated with diesel-soaked clean rags. All wash water and/or solvents will be disposed of as required according to RCRA requirements. All solid waste generated during decontamination operations will also be disposed of according to RCRA requirements.

III. GROUNDWATER MONITORING

Since all soils found to be contaminated will be removed and/or treated in place, long-term groundwater monitoring will not be required. However, short-term vadose-zone-monitoring may be performed as part of the unit characterization to evaluate the extent of the release from this unit.

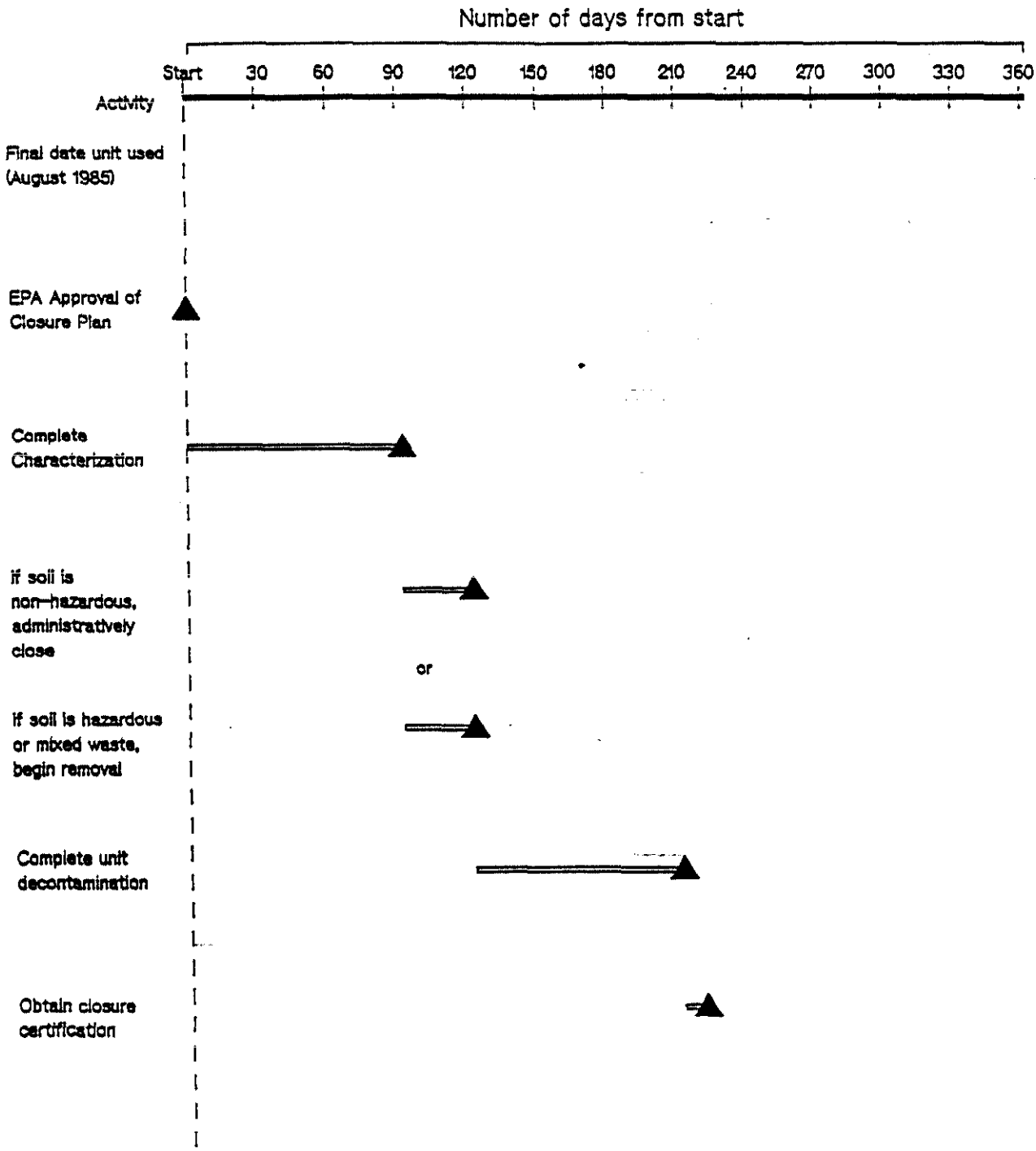
IV. CLOSURE CERTIFICATION

An independent, professional engineer will verify that every major step of the closure process is completed in accordance with the approved plan and will certify that closure is complete. Closure certification will not be necessary if all waste is transported off site to an EPA-approved TSD facility.


STREET
CPP 710
CPP 630
CPP 754 753
CPP 750
CPP 709
CPP 631
CPP 684
RAFUE
(UNDER-CONST.)
CPP 752
CPP 751
CPP 767
CPP 601
RAMP UP
CPP 602
CPP 685
CPP 625
CPP 641
CPP 759
LEACHING
CESSPOOL
CPP 602
CPP 627
CPP 640
T-1
T-5
CPP 734
WASTE MONITORING STATION
CPP 715
(Proposed)
CPP 676
CPP 677
CPP 731
CPP 637
CPP 637
CPP 637
CPP 620
OAK AVENUE
PINE AVE
CPP 637
CPP 651
TEMP TRAILER TR-13
CPP 706
CPP 643
(Proposed)
CPP686
(UNDER
CONST)
PP 669
NTROL
1"=100'
100' 0' 100' 200' 300'
N
CLEVELAND BLVD

Figur

Figure 2
Closure Schedule for the ICPP
Transformer Yard, CPP-731



REFERENCE 2

PERSONAL MEMO OF CONVERSATION

Person Called: Dee Williamson and John Nation
Person Calling: Brian Fourr
Date: March 20, 1992

SUBJECT: CPP-50 CONCRETE TRANSFORMER PAD

On March 19,and 20 1992, I talked with John Nation and Dee Williamson regarding the condition of the concrete transformer pad at CPP-50. Dee had inspected the pad earlier in the year and John went out and inspected the pad on March 19, 1992 at my request. Both men indicated that there is no visible evidence of oil staining on the pad.

REFERENCE 3

TRACK-1 RISK EVALUATION SUMMARY

DATE: 1/24/92

SITE: CPP-50

SUMMARY:

A track-1 assessment was conducted to establish risk-based soil screening concentrations to evaluate PCBs contamination at CPP-50. The dimensions of the contaminated region evaluated in the track-1 assessment are: 3.96 m wide and 4.88 m long, with a depth of 0.61 m. Toxicity data for Aroclor-1260 was used in the evaluation of PCBs. PCBs are classified by the EPA as B2 probable human carcinogens.

The calculation of soil screening concentrations was based on a target risk level representing a hazard quotient of 1 (based on noncarcinogenic effects) or a cancer risk of 1.0E-06 (based on carcinogenic effects). The evaluation followed the track-1 guidance for the assessment of low probability hazard sites at the INEL (DOE/ID-10340(91)).

A summary table of risk-based soil screening concentrations for PCBs is attached. Soil screening concentrations were calculated for both industrial and residential scenarios. The residential scenario considers exposures to individuals living at the site under contaminant conditions that would exist in 100 years (after institutional control). Two potential exposure pathways were evaluated, as applicable to PCBs and based on the availability of toxicity values: soil ingestion and groundwater ingestion (for residential scenario only).

The shaded box in the attached tables shows the lowest risk-based soil concentration for PCBs. Soil ingestion provided the most significant risk (lowest risk-based screening soil concentration) for PCBs.

SUMMARY TABLE OF RISK-BASED SOIL SCREENING CONCENTRATIONS FOR
CPP-50 SOIL CONTAMINATION FOR PCBs (AROCLOR-1260)

Exposure	Scenarios			
	Occupational		Residential	
Pathways	Soil Concentration at 1E-06 Risk (mg/kg)	Soil Concentration at HQ = 1 (mg/kg)	Soil Concentration at 1E-06 Risk (mg/kg)	Soil Concentration at HQ = 1 (mg/kg)
Soil Ingestion	7.40E-01	--	8.31E-02	--
Inhalation of Fugitive Dust	--	--	--	--
Inhalation of Volatiles	NA	NA	NA	NA
Groundwater Ingestion	NA	NA	1.44E-01	--

NA = Not Applicable.
-- = Calculation not performed because of no published toxicity value.
Shaded box = Lowest risk-based soil concentration.